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July 17, 2024

## VIA ECF

United States District Court Eastern District of New York Attn: Hon. Peggy Kuo, U.S.M.J. 225 Cadman Plaza East Courtroom 11C South Brooklyn, NY 11201-1804

Re: Martinez, et al. v. Atlantis Super Wash Center Inc., et al.

Case No.: 1:23-cv-4667 (CBA) (PK)

Dear Judge Kuo:

Defendants Atlantis Super Wash Center Inc., Clean City Laundry Inc., and Nick Mira (collectively hereinafter the "Defendants") respectfully submit this letter motion to request an adjournment of the settlement conference. Pursuant to ¶ III(C) of this Court's Individual Practice Rules ("Individual Rules"), Defendants respectfully submit that: (a) the original date of the settlement conference is set for Friday, July 29, 2024 at 2:00 PM and there has been one previous request for an adjournment of this conference, which was granted on consent; (ii) the reason for the request is because counsel for the Defendant has a prior conflicting hearing scheduled before the Hon. Pamela K. Chen, U.S.D.J.; (iii) Defendants sought and received Plaintiffs' consent on July 16, 2024 to reschedule the July 29, 2024 conference; and (iv) Defendants do not believe that the requested adjournment will affect any other scheduled dates or deadlines such that a revised proposed discovery plan or scheduling Order is necessary. In light of the foregoing, Defendants respectfully submit that sufficient good cause exists to warrant this Court's exercise of discretion in favor of granting an adjournment of the settlement conference. See Fed. R. Civ. P. 6(b)(1)(A). Defendants thank this Court for its time and attention to this case.

Dated: Jamaica, New York July 17, 2024

Respectfully submitted, **SAGE LEGAL LLC** 

\_/s/ Emanuel Kataev, Esq.
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## **VIA ECF**

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